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March 6, 2020

Via ECF

Hon. Lois H. Goodman, U.S.M.J.
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street
Trenton, New Jersey 08608

Re: Americans For Prosperity v. Grewal, et al.
Case No. 3:19-cv-14228-BRM-LHG

American Civil Liberties Union, et al. v. Grewal, et al.
Case No. 3:19-cv-17807-BRM-LHG

Illinois Opportunity Project v. Holden, et al.
Case No. 3:19-cv-17912-BRM-LHG

Dear Judge Goodman:

This office represents the Defendants in the above-captioned cases, which have been designated as related. Please accept this status report as directed by the Court's text orders issued on February 25, 2020. The parties have resolved the American Civil Liberties Union (ACLU) and Illinois Opportunity Project (IOP) cases in their entirety. The parties have agreed in those two cases to enter into

consent orders that convert the pending preliminary injunctions into permanent injunctions against enforcement of the challenged statute (S150) against any “independent expenditure committee,” as that term is used in the statute, or its employees or agents. The parties agree to bear their own legal fees and costs. Proposed consent orders memorializing these terms in the ACLU and IOP cases were submitted to the Honorable Brian R. Martinotti on February 26, 2020. We are awaiting execution of the orders.

The parties in the Americans for Prosperity (AFP) case are working on the terms of a permanent injunction order that will mirror the ACLU and IOP Consent Orders. The parties also have been in active discussions to resolve AFP’s claim for legal fees and costs. We now have determined that those discussions are at an impasse. Given the focus on those negotiations, the parties have not had the opportunity to develop a proposed schedule for future proceedings. Accordingly, we respectfully request that the parties in AFP be given a few extra days, through and including March 11, 2020, to submit a proposed schedule for further proceedings.

Thank you for your consideration of this request.

Respectfully submitted,

GURBIR S. GREWAL
ATTORNEY GENERAL OF NEW JERSEY

By: /s/ Stuart M. Feinblatt
Stuart M. Feinblatt
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C: All counsel of record (via ECF)